

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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FIREMAN'S FUND INSURANCE COMPANY
a/s/o OST TRUCKS & CRANES, INC.
Plaintiff,

08 Civ. 00410 (JGK)

v.

M/V MADAME BUTTERFLY, her engines,
tackle, machinery, etc., *in rem*; WALLENIOUS
WILHELMSSEN LOGISTICS AS; WALLENIOUS
WILHELMSSEN LOGISTICS, INC.; WALLENIOUS
WILHELMSSEN LOGISTICS AMERICAS LLC;
PACIFIC RO RO STEVEDORING, INC.; PACIFIC
RO RO STEVEDORING LLC and PARSIFAL
SHIPPING LTD. *in personam*;
Defendants.

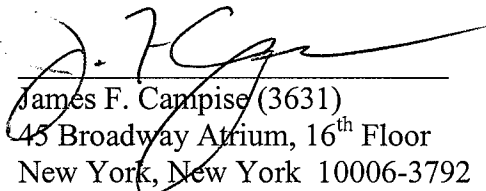
NOTICE OF MOTION
TO INTERVENE

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PLEASE TAKE NOTICE, that Fireman's Fund Insurance Company ("FFIC"), by and through its undersigned attorneys, hereby move this Honorable Court to grant FFIC the right to Intervene as party plaintiff, pursuant to Federal Rule of Civil Procedure 24(a)(2) and 24(b)(2), for the reasons set forth in the accompanying Memorandum of Law.

Annexed hereto and designated Exhibit "A" is a copy of the proposed Complaint.

Dated: New York, New York
June 27, 2008

COZEN O'CONNOR
Attorneys for Plaintiff
FIREMAN'S FUND INSURANCE
COMPANY a/s/o OST TRUCKS & CRANES,
INC.


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